



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

August 3, 2007

Ms. Dale C. Young
Lead Administrative Trustee
Massachusetts Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114-2119

**Re: GE-Pittsfield/Housatonic River Site
Newell Street Area II (GEC450)
Summary of June 2007 Inspection of the Natural Resource Restoration/Enhancement
Area**

Dear Ms. Young:

On June 20, 2007, the General Electric Company (GE) performed the first inspection of areas subject to natural resource restoration/enhancement (NRRE) measures at Newell Street Area II. As shown on Figure 1, areas subject to NRRE measures include the majority of the GE-owned Newell Street parking lot area and a portion of the "wooded area" at Parcel J9-23-12. GE completed the installation of the NRRE measures in June 2006 in accordance with GE's *Final Removal Design/Removal Action Work Plan for Newell Street Area II* (March 2005), as conditionally approved by the U.S. Environmental Protection Agency (EPA) on May 12, 2005, and GE's *Restoration Project Monitoring and Maintenance Plan* (Restoration M&M Plan) provided as Attachment A to the *Final RD/RA Work Plan Addendum for Newell Street Area II* (Addendum, May 2005), as conditionally approved on June 9, 2005. The above-referenced documents were also provided to the Natural Resource Trustees for the Site (Trustees) for review and comment. Trustee comments were provided to GE in letters dated April 25 and June 10, 2005. GE subsequently performed the EPA-approved Removal Action at Newell Street Area II between July 2005 and June 2006, and as part of that action it installed the NRRE measures.

On June 5, 2007, GE submitted to the Trustees a document titled *Completion of Installation of Restoration Work Report* (Restoration Installation Completion Report). That report summarized the NRRE measures installed at Newell Street Area II in accordance with the applicable Performance Standards set out in Attachment I to the *Statement of Work for Removal Actions Outside the River*, which is part of the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. As described in that report, these measures consisted of the following:

- As part of the restoration activities, GE planted an herbaceous native grassland community on the surface of the vegetative engineered barrier at the Newell Street parking lot area (excluding the paved access road), as well as in a portion of the wooded area on Parcel J9-23-12 shown on Figure 1, using a mixture of native grass and wildflower species proposed in the Addendum and approved by EPA.
- In addition, GE installed a bluebird box along the edge of the former parking lot area adjacent to the Housatonic River.

In accordance with the Trustees' June 10, 2005 letter, GE did not place stumps and rock piles within the NRRE areas.

Summary of Inspection Activities

The June 2007 inspection was conducted in accordance with the requirements for such inspections set out in the Restoration M&M Plan attached to the Addendum and also attached to the Restoration Installation Completion Report. This inspection consisted of a field inspection and survey of the planting areas to: (a) verify aerial coverage by herbaceous species; (b) determine any evidence of trespassing or herbivory; (c) assess the apparent vigor of the vegetation; and (d) inspect for the presence of invasive species (as listed in the Restoration M&M Plan). In addition, the bluebird box was inspected to determine if it was functional.

To document the results of the June 2007 inspection, GE completed a Natural Resource Restoration/Enhancement Inspection Checklist and collected photographic documentation of the conditions of the NRRE areas. Copies of the completed checklist and the photographs are provided in Attachments A and B, respectively.

Summary of Observations During Inspection

During the June 2007 inspection, a total of 22 herbaceous species were observed to be present within the NRRE areas (Table 1). The inspection indicated the presence of different stages of vegetation establishment within four portions of the NRRE areas, which are shown on Figure 2. The eastern portion of the NRRE areas supported the tallest vegetation and exhibited approximately 70% ground cover, dominated by white clover (*Trifolium repens*), red fescue (*Festuca rubra*), New England aster (*Aster novae-angliae*), and sweet white clover (*Melilotus alba*). The western portion also exhibited approximately 70% ground cover and was dominated by white clover, red fescue, white clover, and yellow clover (*Trifolium agrarium*), but the plants in that area were shorter in height than the vegetation observed in the eastern area by approximately 1-2 feet. The southeast portion (adjacent to Parcels J9-23-9 and J9-23-10) exhibited approximately 40% ground cover and was dominated by red fescue and Canada wild rye (*Elymus canadensis*). A small area near the northwest corner of the fenced wooded area exhibited approximately 70% ground cover and was dominated by red fescue, Canada wild rye, and Indian grass (*Sorghastrum nutans*). As indicated in the Restoration M&M Plan, the percent coverage Performance Standard for the NRRE areas is 100%. The ground cover observed during the June 2007 inspection appeared to be sufficient that it would be expected to meet the Performance Standard by the 2007 peak growing season in August (when this area will be inspected again, as noted below).

No significant signs of herbivory or stress were observed in the developing plant communities. None of the invasive species listed in the Restoration M&M Plan were observed within the NRRE areas, although some invasive species were present in undisturbed vegetated areas adjacent to the NRRE areas. Since the NRRE areas are surrounded by a locked chain-link fence (except along the river) restricting trespasser access, no signs of damage from trespassers was observed. In addition, the bluebird box was found to be present, intact, and functional.

Schedule of Future Inspections

The Restoration M&M Plan provides that monitoring activities are to consist of two site visits during each of the first three years after planting, one visit during the fifth year after planting, and

one visit during the seventh year after planting. In each of the first three years after planting, visits are to be conducted in the late spring after the first leaf flush (May/June) and in the summer (July/August) to assess plant survival. The single visit in the fifth and seventh year after planting is to be conducted in the summer (July/August). Following each inspection, an inspection report is to be prepared and submitted to the Trustees (through the Lead Administrative Trustee), with copies to EPA and the Massachusetts Department of Environmental Protection (MDEP). In accordance with this schedule, GE has scheduled the second inspection of the NRRE areas at Newell Street Area II to occur during the week of August 27, 2007.

Future inspections will include observations of areas where any follow-up activities are identified during the prior inspection. Follow-up activities may include replanting, reseeding, fertilizing, or watering areas with sparse vegetation; implementing measures to reduce herbivory; and/or ensuring that no greater than 5% of any area within the planting areas is covered with invasive species. In addition, mowing of the planted areas is to be conducted once every one to three years after August 1 to control shrub and tree growth. GE is currently planning to conduct such mowing in fall 2008.

As noted in the Restoration Installation Completion Report, GE will coordinate with EPA and the Trustees to schedule an installation inspection and meeting in the near future, to be followed by the Trustees' determination of whether the installation of the NRRE measures at Newell Street Area II has been completed in accordance with the applicable requirements and Performance Standards in the CD. In the meantime, please call me if you have any questions about this matter.

Sincerely,

Richard W. Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA (* without attachments)
Richard Fisher, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Susan Steenstrup, MDEP (2 copies)
Mayor James Ruberto, City of Pittsfield
Nancy E. Harper, MA AG*
Michael Carroll, GE*
Andrew Silber, GE
Rod McLaren, GE
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repositories

Table

TABLE 1
LIST OF PLANT SPECIES OBSERVED DURING THE JUNE 2007 INSPECTION

SUMMARY OF JUNE 2007 INSPECTION OF THE NATURAL RESOURCE RESTORATION/ENHANCEMENT AREAS
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

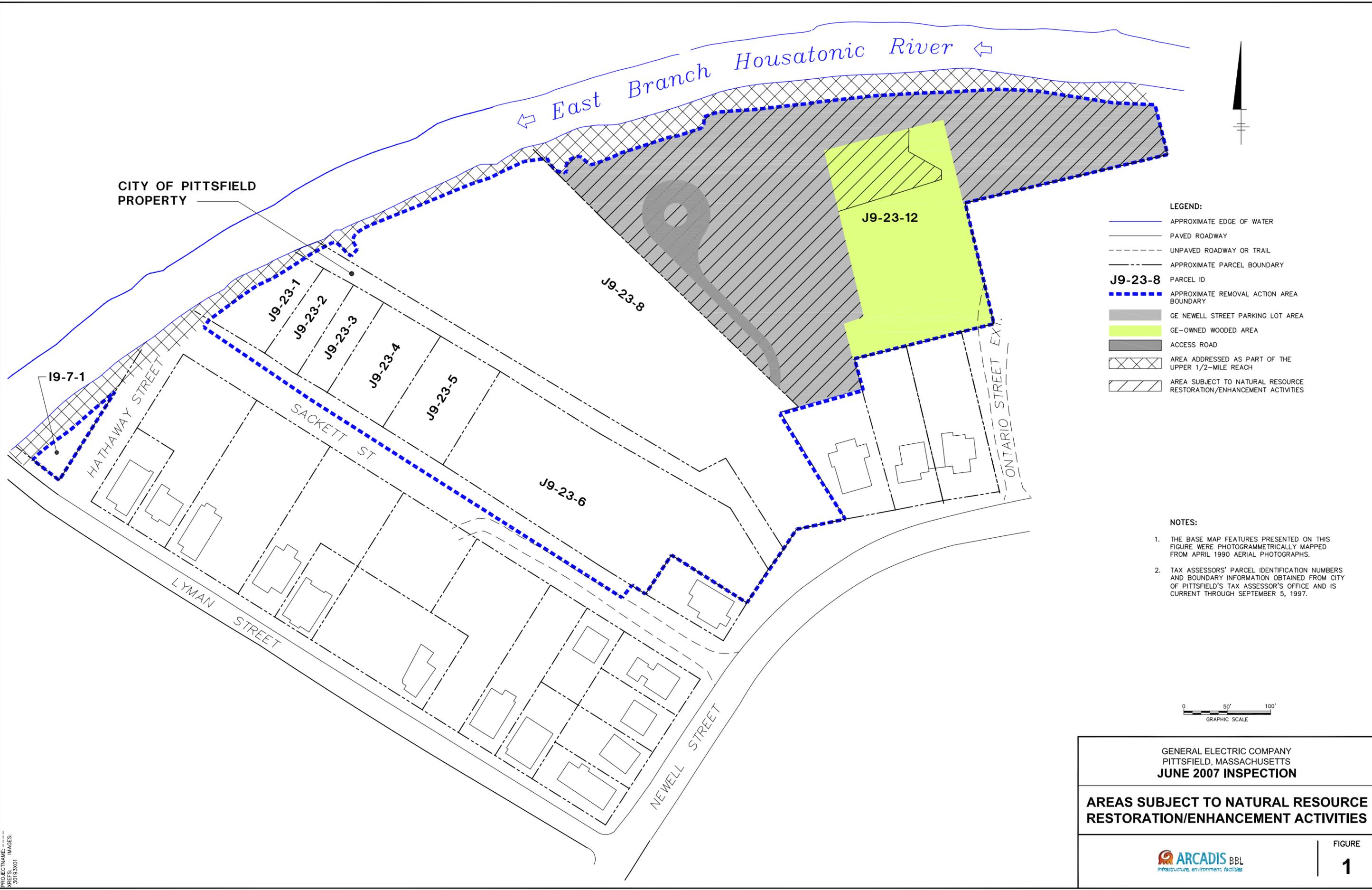
| Common Name | Scientific Name |
|---------------------------|-----------------------------------|
| Aspen (seedlings) | <i>Populus</i> sp. |
| Bladder Campion | <i>Silene cucubalus</i> |
| Butterfly Milkweed | <i>Asclepias tuberosa</i> |
| Canada Wild Rye | <i>Elymus canadensis</i> |
| Common Aster | <i>Aster</i> sp. |
| Cow Vetch | <i>Vicia cracca</i> |
| Daisy Fleabane | <i>Erigeron annuus</i> |
| Hoary Alyssum | <i>Berteroa incana</i> |
| Indian Grass | <i>Sorghastrum nutans</i> |
| Lupine | <i>Lupinus</i> sp. |
| Common Mullen | <i>Verbascum thapsus</i> |
| New England Aster | <i>Aster novae-angliae</i> |
| Oxeye Daisy | <i>Chrysanthemum leucanthemum</i> |
| Red Clover | <i>Trifolium pratense</i> |
| Red Fescue | <i>Festuca rubra</i> |
| Showy Tick Trefoil | <i>Desmodium canadense</i> |
| Sweet White Clover | <i>Melilotus alba</i> |
| Tickseed Sunflower | <i>Bidens coreopsis</i> |
| White Clover | <i>Trifolium repens</i> |
| Wild Carrot | <i>Daucus carota</i> |
| Yellow Clover | <i>Trifolium agrarium</i> |
| Yellow Goats Beard | <i>Tragopogon pratensis</i> |

Notes:

1. Plants in bold are species that were planted as part of the New England wildflower seed mix applied during restoration.
2. None of the species listed above were included in the list of invasive species of concern in the Addendum.

Figures

[SYR-85-SYR] SYR-85-KLS LAYER: ON* OFF=*REF*
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 PLOTNAME: IMAGES: 30193X01



CITY OF PITTSFIELD PROPERTY

East Branch Housatonic River



- LEGEND:**
- APPROXIMATE EDGE OF WATER
 - PAVED ROADWAY
 - UNPAVED ROADWAY OR TRAIL
 - APPROXIMATE PARCEL BOUNDARY
 - J9-23-8** PARCEL ID
 - APPROXIMATE REMOVAL ACTION AREA BOUNDARY
 - GE NEWELL STREET PARKING LOT AREA
 - GE-OWNED WOODED AREA
 - ACCESS ROAD
 - AREA ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH
 - AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.



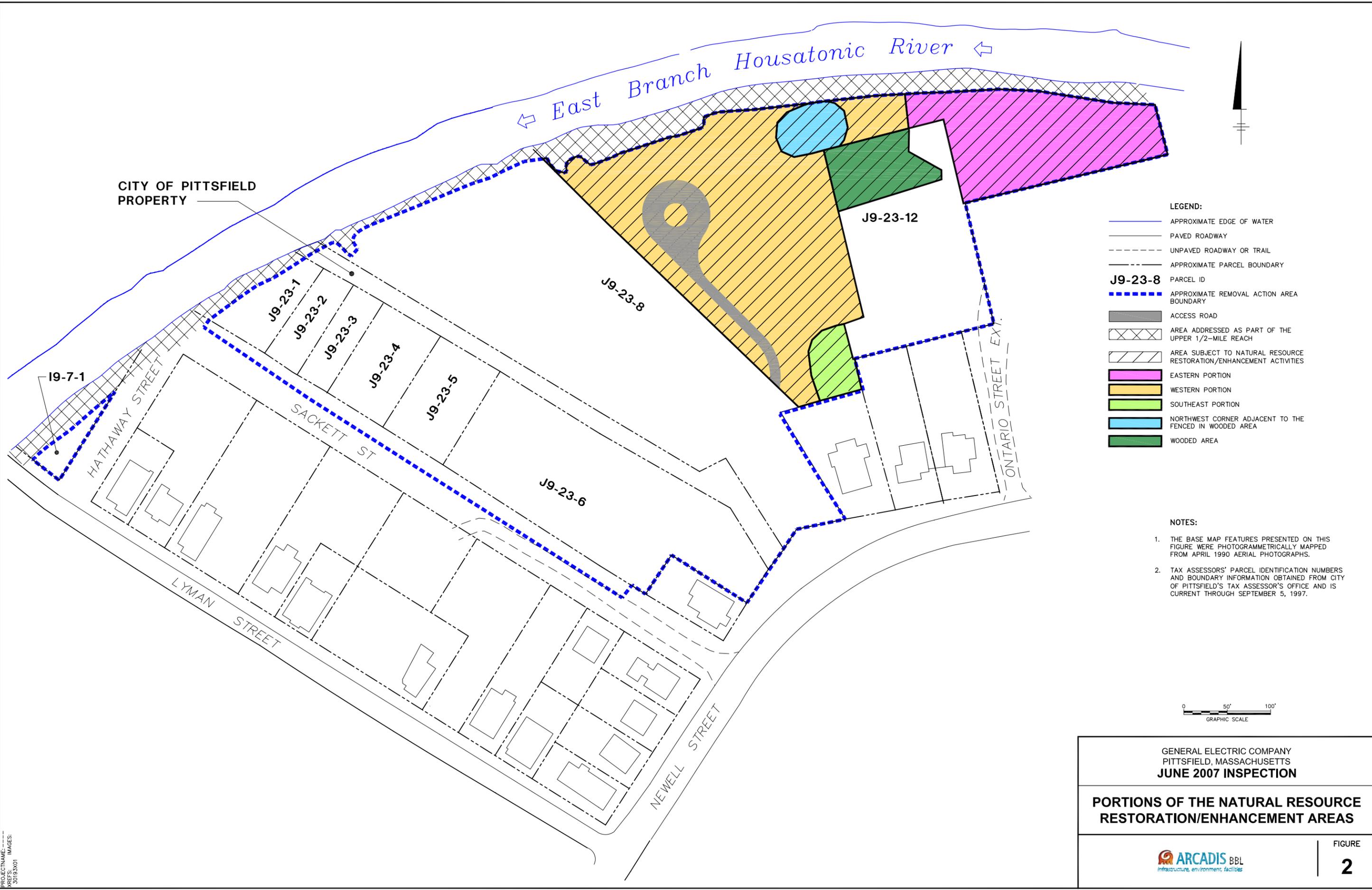
GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
JUNE 2007 INSPECTION

AREAS SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES

ARCADIS BBL
infrastructure, environment, facilities

FIGURE
1

[SYR-85-SYR] SYR-85-KLS DMW LAF LAYER: ON=*, OFF=*REF*
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CITY OF PITTSFIELD
PROPERTY

East Branch Housatonic River ←

J9-23-12

J9-23-8

J9-23-1

J9-23-2

J9-23-3

J9-23-4

J9-23-5

J9-23-6

I9-7-1

HATHAWAY STREET

SACKETT ST

LYMAN STREET

NEWELL STREET

ONTARIO STREET EXT.

LEGEND:

- APPROXIMATE EDGE OF WATER
- PAVED ROADWAY
- UNPAVED ROADWAY OR TRAIL
- APPROXIMATE PARCEL BOUNDARY
- J9-23-8** PARCEL ID
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
- ACCESS ROAD
- AREA ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES
- EASTERN PORTION
- WESTERN PORTION
- SOUTHEAST PORTION
- NORTHWEST CORNER ADJACENT TO THE FENCED IN WOODED AREA
- WOODED AREA

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
JUNE 2007 INSPECTION

**PORTIONS OF THE NATURAL RESOURCE
 RESTORATION/ENHANCEMENT AREAS**

ARCADIS BBL
infrastructure, environment, facilities

FIGURE
2

Attachment A

**NATURAL RESOURCE RESTORATION / ENHANCEMENT
INSPECTION SUMMARY AND CHECKLIST**

NEWELL STREET AREA II REMOVAL ACTION

PARCEL J9-23-12 (PARKING LOT AREA AND PORTION OF WOODED AREA)

I. GENERAL INFORMATION

Inspection Date: June 20, 2007
Conducted By: Anthony Esposito, David Cassel
Weather Conditions: Partly Cloudy, 75 degrees F
Date of Last Inspection: NA

II. INSPECTION SUMMARY

1. Groundcover

A. Estimated Groundcover *(Note a percentage of groundcover by herbaceous species; note evidence of areas of bare/sparse vegetation; note any damage from trespassing or herbivory; note any physical changes since last inspection, etc.)*

Eastern, western, and southeastern portions - 70% total groundcover.
Small area near the northwest corner of the wooded fenced area - 40% total groundcover.
No bare areas observed. No damage from trespass or herbivory observed.

B. Presence of Invasive Species *(Note a percentage of area occupied by invasive species; note the species present including but not limited to the following: Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Common barberry, Common buckthorn, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrows' X Tartarian honeysuckle [hybrid], Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Tartarian honeysuckle, or Yellow iris, etc.)*

None of the listed species were observed in the NRRE areas.

2. Bluebird box to be inspected on a yearly basis for 3 years. *(Note any evidence of damage and the extent of damage such as the need to be replaced.)*

Bluebird box present, intact, and functional.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

Cap grading appropriate with no standing water observed. Tire tracks observed that did not affect cap integrity.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

The ground cover observed during the June 2007 inspection appeared to be adequate to meet the performance standard by the 2007 peak growing season in August.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE



Photo #1: View from the northeast corner looking at the eastern portion.



Photo #2: View from the southeast corner looking at the western portion.

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| Client: General Electric Company |
| Project Name: Newell Street Area II |
| Project Location: Pittsfield, Massachusetts |

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Photo #3: View from the north end of the site trailer looking at the western portion.



Photo #4: View from fenceline of wooded area looking at the southeastern portion.

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|---|
| Client: General Electric Company |
| Project Name: Newell Street Area II |
| Project Location: Pittsfield, Massachusetts |

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Photo #5: Looking at the small area northwest of the wooded area.



Photo #6: View from the western fenceline looking at the wooded area.

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|---|
| Client: General Electric Company |
| Project Name: Newell Street Area II |
| Project Location: Pittsfield, Massachusetts |

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